

REMARKS

Status of the Claims

- Claims 1-20 are pending in the Application.
- Claims 1-20 are rejected by Examiner.

Interview

Applicant's representative thanks the Examiner for granting a telephone interview held 3/27/2007. During that interview, Applicant's representative explained that, as in Claim 1, the system is placed in the context of a software development environment having a text editor that inputs an original format file and automatically modifies characters in the original file. The remaining functionality of the invention was then explained. Applicant's representative then noted that the software development environment text editor that automatically applies character modification to an input file is not present in the 35 U.S.C. §102 cited art. Also, the cited art does not contain all of the elements recited in Claim 1. The Examiner graciously indicated that she would review the details of the rejection against the arguments in the present Office Action. Applicant's representative requested a telephone call if any questions remained after the Examiner reviewed Applicant's response.

Claim Rejections Pursuant to 35 U.S.C. §102

Claims 1-3, 8-11, and 14-20 stand rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,336,124 to Alam et al. (Alam). Applicant respectfully traverses the rejection.

The present application address a system for preserving original formatting characters in a text file that is edited in a software development environment. In one embodiment in the application, an original input text file having original formatting is input into the software development environment. The software environment editor applies automatic formatting character modifications to the input file automatically. This action generates a first modified text file. Next, a user of the software environment editor applies his edits to the first modified text file and generates a second modified text file. The two text files are compared to discover the changes made by the user editing. The discovered changes

are applied to the original input text file to generate a final file. This series of events produces a final file that has the user edits, yet preserves the original text file formatting.

The system of Claim 1 has elements that include:

“a software development environment editor, the editor comprising software that inputs an original text file having original formatting characters and produces a first modified text file, the first modified text file having automatic formatting character modifications made by the editor, the editor accepting user changes to the first modified text file to produce a second modified text file having the automatic formatting character modifications and the user edits;” and

“a source code preservation module that receives an the original text file, compares a the first modified text file with a the second modified text file to find a modified block of text and applies the modified block of text to the original text file to generate a final file with the original formatting characters, whereby the source code preservation module preserves the original formatting characters in the final file.”
(elements of Claim 1)

The present Office Action dated 2/21/07 cites Alam which “...relates generally to a method for converting a document stored in one format to a different format. More specifically, a system and method for converting digital data representing an image of a document image stored in one format to other formats for manipulation and display...” (Alam, col. 1 lines 16-21).

Page 3 of the present Office Action indicates that elements of Claim 1 are taught by Alam. Applicant respectfully disagrees. For example, the Office Action states that:

“Alam teaches a system to preserve formatting from an original file edited in a software development environment including a software development editor allowing a user to input an original text file having formatting characters (See Alam, Figure 5, and Column 6, lines 9-10).”

Applicant notes that Alam does not disclose a software development environment at all. As stated in col. 6, lines 9-10, Alam teaches: “Alternatively, a text and/or image authoring

tool 516 may be utilized to create a text and/or image document 518.” Applicant respectfully submits that a text and or image document creation is not a software development tool as known to those of skill in the art. Thus, Alam fails to disclose “A system for preserving original formatting characters in a text file that is edited in a software development environment” as recited in Claim 1.

Page 3 of the present Office Action also states that: “Alam also teaches accepting user changes to the first modified text file (See Alam, Column 1 , lines 41 -50).” Applicant respectfully disagrees because Alam, col. 1, lines 41-40 discuss the prior art or background which indicates that it is desirable to manipulate an *image* document. No text document is mentioned. Alam at col. 1 lines 41-50 teaches:

“Further, such *image processing* research and products have also not focussed on the conversion of such information to a format that a user may easily manipulate in order to utilize all or a portion of the information contained in the document and/or to reformat the document as desired into a different layout. For example, it may be desirable for the user to manipulate the document by cutting, pasting and/or otherwise editing or revising the document to reformat and/or to fully or partially utilize the information contained in the document such as for analysis and/or other uses.” (Alam, col. 1 lines 41-50)

Applicant submits that in the above Col. 1 teaching of the background of Alam discusses image processing research and products and the desirability to edit an image document. Applicant respectfully submits that this citation fails to teach the element in claim 1 which, in a software development environment editor, the editor comprising software that inputs an original text file having original formatting characters and produces a first modified text file, *the first modified text file having automatic formatting character modifications made by the editor* as recited in Claim 1.

Whereas the cited portion of Alam discusses image processing, Claim 1 recites a software editor and the inputting of a text file. Whereas Alam discusses the desirability of editing an image file, Claim 1 recites modification of an input file, not by the user, but by the software development editor where the modification is an automatic character modification by the editor.

Applicant respectfully submits that Alam at Col. 1, lines 41-50 fails to teach a software development environment editor, and fails to teach that an input file is modified automatically by the software development editor to produce a first modified text file as recited in Claim 1.

Page 3 of the present Office Action states: “Alam also teaches producing a second modified text file having automatic formatting character modifications and user edits (See Alam, Column 6, lines 50-65).” Applicant respectfully disagrees because the cited portion of Alam actually teaches away from the claimed invention. Alam at col. 6, lines 50-65 states:

“The intermediate format is preferably a format that can be easily utilized to transfer the data representing the contents of the documents to any other desired output format. In essence, the intermediate format serves as a document translator. *The intermediate format document preferably includes information including characters and their fonts (including italics), sizes, weights (bold or normal), underlines, and locations within a document.* The intermediate format document preferably groups characters into words, lines, paragraphs, and/or tables. Each group is stored in the intermediate format document as an intermediate format block. The intermediate format block may also store an image or other grouped or blocked portion of the input document. The intermediate format preferably also retains information on bookmarks, document links, raster images and vector images contained in the input document.” (col. 6, lines 50-65).

Applicant notes that Alam, at col 6, lines 50-65 specifically teaches that the intermediate format document includes information including characters and their fonts (including italics), sizes, weights (bold or normal), underlines, and locations within a document. This is in contrast to the Claim 1 element of the editor accepting user changes to the first modified text file to produce a second modified text file having the automatic formatting character modifications and the user edits. First Applicant note the absence of a software development environment editor in Alam. Next, Applicant notes that there are no user edits in the “intermediate format document” of Alam. Also, the intermediate format document of Alam retains the “characters and fonts” of the document, whereas in Claim 1,

the software environment editor automatically modifies format characters. This is in distinction to Alam which includes character and font information in the document.

Applicant respectfully submits that Alam at Col. 6, lines 50-65 fails to teach a second modified text file having the automatic formatting character modifications and the user edits as recited in Claim 1.

Page 3 of the present Office Action states: “Alam also teaches comparing the first modified text file with the second modified text file to find a modified block of text and applying the modified block of text to the original file to create a final file (See Alam, Column 8, lines 15-36).” Applicant respectfully disagrees because Alam at Col 8, lines 15-36 teaches a step of Figure 7 to extract data from an image of a document and convert the data to the intermediate format. (Alam, col. 7, lines 12-15). Alam does not teach the comparison of a first modified text file with a second modified text file as recited in Claim 1.

The cited portion of Alam at col. 8 lines 15-36 teaches step 704 in the Figure 7 data extraction and conversion method using the expanded step 704 method of Figure 8. Alam, col 8, lines 15-36 states:

“A determination is made whether the selected word is in the current line at step 806. To determine whether the selected word is in the current line, the appropriate Y coordinate(s), i.e., in the vertical direction, of the selected word are compared with the appropriate Y coordinate(s) of the previous word in the current line to determine whether certain line parameters and/or thresholds are satisfied. For example, the top Y coordinate of the selected word may be compared with the top Y coordinate of the previous word in the current line to determine the inter-word spacing in the Y direction. If the inter-word spacing or distance in the Y direction is greater than a threshold of, for example, 10% of the average character height, then the inter-word spacing parameter in the Y direction is not met and the word is determined not to be in the current line. The average character height may be determined from the words in the current line or from all the words in the document, for example. Of course, other suitable comparisons and/or analysis may be made by step 806 to determine whether the selected word is in the current line.”

Applicant respectfully submits that Alam at Col 8, lines 15-36 fails to teach the Claim 1 element of comparing the first modified text file with the second modified text file to find a modified block of text and applies the modified block of text to the original text file to generate a final file with the original formatting characters, whereby the source code preservation module preserves the original formatting characters in the final file. Alam fails to teach this element for several reasons.

First, the cited portion of Col 8, lines 15-36 teaches a method to join located words in an image document into lines. (See col. 8, lines 8-10.) Thus, the cited portion of Alam fails to teach a comparison of a first modified file generated automatically by a software development editor with a second modified text file which includes user edits and generation of a final file with the original input file formatting.

Second, the cited portion of col. 8, lines 15-36 represents only step 704 of Figure 7 which results in the generation of the intermediate format of Alam (See Figure 7, final step 710). The present Office Action identified the intermediate format of Alam to be analogous to the second modified text file (See Office Action page 3 and above). The process of Col. 8 lines 15-36, which ultimately generates only the intermediate format therefore logically cannot include the Claim 1 element that “compares the first modified text file with the second modified text file to find a modified block of text and applies the modified block of text to the original text file to generate a final file with the original formatting characters”. Therefore, the last element of Claim 1 is not taught by col. 8 lines 15-36 because the cited portion of Alam only addresses generation of the intermediate format and no further scope. The cited portion of Alam fails to teach the scope of the last element of Claim 1.

Applicant agrees with the Examiner that Alam does not teach expressly preserving the original formatting characters in the final file. Applicant further submits that Alam teaches a process that is different than the process recited in Claim 1. Also, Alam does not teach or suggest involvement of a software development environment editor or the preservation of original formatting characters in a final file as expressed in Claim 1.

Accordingly, Applicant respectfully submits that Alma does not render Claim 1 obvious because not all elements of Claim 1 are taught by Alam. Specifically, Alam fails to teach the elements of:

(1) a software development environment editor, the editor comprising software that inputs an original text file having original formatting characters and produces a first modified text file, the first modified text file having automatic formatting character modifications made by the editor,

(2) the editor accepting user changes to the first modified text file to produce a second modified text file having the automatic formatting character modifications and the user edits;

(3) a source code preservation module that receives the original text file, compares the first modified text file with the second modified text file to find a modified block of text and applies the modified block of text to the original text file to generate a final file with the original formatting characters, whereby the source code preservation module preserves the original formatting characters in the final file.

Since Alam does not teach or suggest all of the elements of Claim 1, then Alam cannot render obvious Claim 1 under 35 U.S.C. §103(a) according to MPEP §2143.03. Applicant submits that independent Claims 8 and 17 have similar elements as Claim 1 and are likewise not rendered obvious because all elements of those independent claims are not taught or suggested by Alam. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection because Claims 1-20 patentably define over the cited art.

Claims 4-7 and 12-13 stand rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,336,124 to Alam et al. (Alam) in view of U.S. Patent No. 6,996,780 to Estrada. Applicant respectfully traverses the rejection.

As mentioned above, Alam fails to teach all of the elements of independent Claims 1, 8, and 17. The present Office Action page 6 cites Estrada col. 15 lines 25-65 and col. 28, lines 64-67 and col. 29, lines 1-6. Applicant finds that Estrada fails to teach all of the elements of the pending independent claims that missing in Alma. Applicant respectfully

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submits that the combination of Alam and Estrada fail to teach all of the elements of the pending claims. For example, the combination of Alma and Estrada fail to teach the exact same method of Claim 1 including all of the limitations of Claim 1.

Applicant respectfully submits that the combination of Alam and Estrada fail to form a prima facie case of obviousness under 35 U.S.C. §103(a) per MPEP §2143.03 because all elements of the pending claims are not in the combination of references. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection and reconsideration of all pending claims.

Conclusion

Applicant respectfully requests reconsideration of all pending claims in light of the discussion provided above.

Respectfully Submitted,

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/Jerome G. Schaefer/

Jerome G. Schaefer
Registration No. 50,800

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439